

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WISCONSIN, MILWAUKEE DIVISION**

Girl Scouts of Manitou Council, Inc.
a Wisconsin Non-Profit Corporation,

Plaintiff,

v.

Girl Scouts of the United States
of America, Inc.,
a District of Columbia
Non-Profit Corporation, Kathy Cloninger,
Patricia Diaz Dennis, and Linda Foreman,
individuals,

Defendants.

Case No. 08-C-0184

**DEFENDANTS GIRL SCOUTS OF THE UNITED STATES OF
AMERICA, KATHY CLONINGER, PATRICIA DIAZ DENNIS AND
LINDA FOREMAN’S MOTION TO DISMISS COUNT XI OF MANITOU
COUNCIL’S FIRST AMENDED COMPLAINT**

Defendants Girl Scouts of the United States of America (“GSUSA”), Kathy Cloninger, Patricia Diaz Dennis and Linda Foreman (“Individual Defendants”) (collectively “Defendants”) respectfully move this Court, pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure, for an Order dismissing with prejudice all claims asserted against Defendants in Count XI and against Individual Defendants in the caption and subparagraphs 2(b) – (d) of the First Amended Complaint filed in the above-captioned action. Defendants have filed and incorporate herein its Memorandum of Law in support of this motion.

WHEREFORE, Defendants respectfully move the Court:

1. To dismiss with prejudice all claims asserted against Defendants in Count XI of the First Amended Complaint filed in the above-captioned action.

2. To dismiss with prejudice all allegations asserted against Individual Defendants in the caption and subparagraphs 2(b) – (d) of the First Amended Complaint filed in the above-captioned action.

3. To grant Defendants such other and further relief as the Court deems just and necessary.

Dated: May 30, 2008

Respectfully submitted,

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